

SUPERIOR COURT  
OF THE  
DISTRICT OF COLUMBIA

Holding a Criminal Term

Grand Jury Sworn in on July 5, 2011

THE UNITED STATES OF AMERICA	:	Criminal No: 2009CF120951
	:	
v.	:	Violation:
	:	22 D.C. Code, Sections 2101, 4502;
ROBERT CARTER	:	22 D.C. Code, Section 4504(b);
PDID: 425350	:	22 D.C. Code, Section 2001, 4502;
	:	22 D.C. Code, Sections 401, 4502;
	:	22 D.C. Code, Section 3211, 3212(a);
DCTN:U10009639	:	22 D.C. Code, Section 3215;
	:	22 D.C. Code, Section 2803(b)(1) (2001 ed.)
	:	
	:	(First Degree Murder While Armed
	:	(Premeditated); Possession Of a Firearm
	:	During Crime Of Violence Or Dangerous
	:	Offense; Kidnapping While Armed; Assault
	:	With Intent To Kill While Armed; First Degree
	:	Theft; Unauthorized Use Of a Vehicle; Armed
	:	Carjacking)

The Grand Jury charges:

FIRST COUNT:

Robert Carter, within the District of Columbia, while armed with a firearm, that is a pistol, purposely and with deliberate and premeditated malice, killed Angel Morse by shooting her with a firearm, that is a pistol, on or about October 29, 2010, thereby causing injuries from which Angel Morse died on or about October 29, 2010. (First Degree Murder While Armed (Premeditated), in violation of 22 D.C. Code, Sections 2101, 4502 (2001 ed.))

*The Grand Jury further charges:*

At the time of the offense charged in the first count of this indictment, the following aggravating circumstances existed: the murder victim was especially vulnerable due to age or physical infirmity. (First Degree Murder While Armed (Premeditated), With Aggravating Circumstance, in violation of 22 D.C. Code, Sections 2101, 2104.01(10), 4502 (2001 ed.))

SECOND COUNT:

On or about October 29, 2010, within the District of Columbia, Robert Carter did possess a firearm, that is, a pistol, while committing the crime of murder as set forth in the first count of this indictment. (Possession Of a Firearm During Crime Of Violence Or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.))

THIRD COUNT:

On or about October 29, 2010, within the District of Columbia, Robert Carter, while armed with a firearm, that is, a pistol, seized, confined, kidnapped, abducted, inveigled, and carried away [REDACTED] Morse, with intent to hold and detain [REDACTED] Morse, for a purpose unknown to the Grand Jury. (Kidnapping While Armed, in violation of 22 D.C. Code, Section 2001, 4502 (2001 ed.))

FOURTH COUNT:

On or about October 29, 2010, within the District of Columbia, Robert Carter did possess a firearm, that is, a pistol, while committing the crime of kidnapping as set forth in the third count of this indictment. (Possession Of a Firearm During Crime Of Violence Or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.))

FIFTH COUNT:

On or about October 29, 2010, within the District of Columbia, Robert Carter, while armed with a firearm, that is, a pistol, seized, confined, kidnapped, abducted, inveigled, and carried away █████ Walker, with intent to hold and detain █████ Walker, for a purpose unknown to the Grand Jury. (Kidnapping While Armed, in violation of 22 D.C. Code, Section 2001, 4502 (2001 ed.))

SIXTH COUNT:

On or about October 29, 2010, within the District of Columbia, Robert Carter did possess a firearm, that is, a pistol, while committing the crime of kidnapping as set forth in the fifth count of this indictment. (Possession Of a Firearm During Crime Of Violence Or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.))

SEVENTH COUNT:

On or about October 29, 2010, within the District of Columbia, Robert Carter, while armed with a firearm, that is, a pistol, seized, confined, kidnapped, abducted, inveigled, and carried away █████ Gordon, with intent to hold and detain █████ Gordon, for a purpose unknown to the Grand Jury. (Kidnapping While Armed, in violation of 22 D.C. Code, Section 2001, 4502 (2001 ed.))

EIGHTH COUNT:

On or about October 29, 2010, within the District of Columbia, Robert Carter did possess a firearm, that is, a pistol, while committing the crime of kidnapping as set forth in the seventh count of this indictment. (Possession Of a Firearm During Crime Of Violence Or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.))

NINTH COUNT:

On or about October 29, 2010, within the District of Columbia, Robert Carter, while armed with a firearm, that is, a pistol, seized, confined, kidnapped, abducted, inveigled, and carried away [REDACTED] Morse, with intent to hold and detain [REDACTED] Morse, for a purpose unknown to the Grand Jury. (Kidnapping While Armed, in violation of 22 D.C. Code, Section 2001, 4502 (2001 ed.))

TENTH COUNT:

On or about October 29, 2010, within the District of Columbia, Robert Carter did possess a firearm, that is, a pistol, while committing the crime of kidnapping as set forth in the ninth count of this indictment. (Possession Of a Firearm During Crime Of Violence Or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.))

ELEVENTH COUNT:

On or about October 29, 2010, within the District of Columbia, Robert Carter, while armed with a firearm, that is, a pistol, seized, confined, kidnapped, abducted, inveigled, and carried away [REDACTED] Morse, with intent to hold and detain [REDACTED] Morse, for a purpose unknown to the Grand Jury. (Kidnapping While Armed, in violation of 22 D.C. Code, Section 2001, 4502 (2001 ed.))

TWELFTH COUNT:

On or about October 29, 2010, within the District of Columbia, Robert Carter did possess a firearm, that is, a pistol, while committing the crime of kidnapping as set forth in the eleventh count of this indictment. (Possession Of a Firearm During Crime Of Violence Or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.))

THIRTEENTH COUNT:

On or about October 29, 2010, within the District of Columbia, Robert Carter, while armed with a firearm, that is, a pistol, seized, confined, kidnapped, abducted, inveigled, and carried away [REDACTED] Morse, with intent to hold and detain [REDACTED] Morse, for a purpose unknown to the Grand Jury. (Kidnapping While Armed, in violation of 22 D.C. Code, Section 2001, 4502 (2001 ed.))

FOURTEENTH COUNT:

On or about October 29, 2010, within the District of Columbia, Robert Carter did possess a firearm, that is, a pistol, while committing the crime of kidnapping as set forth in the thirteenth count of this indictment. (Possession Of a Firearm During Crime Of Violence Or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.))

FIFTEENTH COUNT:

On or about October 29, 2010, within the District of Columbia, Robert Carter, while armed with a firearm, that is, a pistol, assaulted [REDACTED] Morse with intent to kill her. (Assault With Intent To Kill While Armed, in violation of 22 D.C. Code, Sections 401, 4502 (2001 ed.))

SIXTEENTH COUNT:

On or about October 29, 2010, within the District of Columbia, Robert Carter did possess a firearm, that is, a pistol, while committing the crime of assault with intent to kill as set forth in the fifteenth count of this indictment. (Possession Of a Firearm During Crime Of Violence Or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.))

SEVENTEENTH COUNT:

On or about October 29, 2010, within the District of Columbia, Robert Carter, while armed with a firearm, that is, a pistol, assaulted [REDACTED] Walker with intent to kill another. (Assault With Intent To Kill While Armed, in violation of 22 D.C. Code, Sections 401, 4502 (2001 ed.))

EIGHTEENTH COUNT:

On or about October 29, 2010, within the District of Columbia, Robert Carter did possess a firearm, that is, a pistol, while committing the crime of assault with intent to kill as set forth in the seventeenth count of this indictment. (Possession Of a Firearm During Crime Of Violence Or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.))

NINETEENTH COUNT:

On or about October 29, 2010, within the District of Columbia, Robert Carter wrongfully obtained and used property of a value of \$250 or more, belonging to [REDACTED] Gordon, consisting of a vehicle, with the intent to appropriate the property for his own use and to deprive [REDACTED] Gordon of a right to and benefit of the property. (First Degree Theft, in violation of 22 D.C. Code, Section 3211, 3212(a) (2001 ed.))

TWENTIETH COUNT:

On or about October 29, 2010, within the District of Columbia, Robert Carter, feloniously did take, use, operate and remove one certain motor vehicle, property of [REDACTED] Gordon, and did operate and drive that motor vehicle for his own purpose, without the consent of [REDACTED] Gordon, the owner of that motor vehicle. (Unauthorized Use Of a Vehicle, in violation of 22 D.C. Code, Section 3215 (2001 ed.))

TWENTY-FIRST COUNT:

On or about October 29, 2010 within the District of Columbia, Robert Carter, while armed with a firearm, that is, a pistol, by force and violence, against resistance or by sudden and stealthy seizure, or by putting in fear, stole and took a motor vehicle from the person and from the immediate actual possession of [REDACTED] Green. (Armed Carjacking, in violation of 22 D.C. Code, Section 2803(b)(1) (2001 ed.))

TWENTY-SECOND COUNT:

On or about October 29, 2010, within the District of Columbia, Robert Carter did possess a firearm, that is, a pistol, while committing the crime of carjacking as set forth in the twenty-first count of this indictment. (Possession Of a Firearm During Crime Of Violence Or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.))

TWENTY-THIRD COUNT:

On or about October 29, 2010, within the District of Columbia, Robert Carter, while armed with a firearm, that is, a pistol, seized, confined, kidnapped, abducted, inveigled, and carried away [REDACTED] Church, with intent to hold and detain Myrtle Church, for a purpose unknown to the Grand Jury. (Kidnapping While Armed, in violation of 22 D.C. Code, Section 2001, 4502 (2001 ed.))

TWENTY-FOURTH COUNT:

On or about October 29, 2010, within the District of Columbia, Robert Carter did possess a firearm, that is, a pistol, while committing the crime of kidnapping as set forth in the twenty-third count of this indictment. (Possession Of a Firearm During Crime Of Violence Or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.))

RONALD C. MACHEN JR.  
United States Attorney  
in and for the District of Columbia

A TRUE BILL:

Foreperson